



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 28 2012

REPLY TO THE ATTENTION OF:
WU-16J

Mr. Tom Athans
Helicon Holdings
1001 Woodward Ave., Suite 400
Detroit, Michigan 48226

Subject: Approval of Proposed Procedures for a radioactive tracer survey, temperature log, and amplified annulus pressure test scheduled for December 3, 4, and 5, 2012 in Environmental GeoTechnologies (EGT) well #s 1-12 and 2-12, United States Environmental Protection Agency Underground Injection Control (UIC) Permit #MI-163-1W-C010 and #MI-163-1W-C011

Dear Mr. Athans:

I have reviewed the procedures attached to Jeffrey Woolstrum's letter of October 31, 2012, for the testing referenced above. The test procedures are approved with the addition of the following requirements for each well:

- The annulus fluid returned at the conclusion of the Amplified Annulus Pressure Test must be recorded and reported with the test results.
- Prior to running the temperature log, the temperature logging tool must be compared with a calibrated thermometer in ice water and water of ambient temperature. These temperature readings must be recorded and reported with the test results.
- A gamma ray log must be run in conjunction with the temperature logs.
- Injection of fresh water at a flow rate between 20 and 50 gallons per minute is approved for conducting the radioactive tracer surveys.

Please remember to submit the digital data either on diskette, CD or by email when the report is submitted.

Our policies require that testing be witnessed by our contract field inspectors. Please contact Jeff McDonald at (312) 353-6288 to schedule the witnessing of these tests. Unwitnessed tests are only acceptable if it is impossible for the field inspectors to be present. If tests do not provide definitive information concerning the conditions which they are designed to ascertain, EGT will be required to rerun them.

If you have any questions or comments about the contents of this letter, please contact me by phone at (312) 353-7316 or by email to batka.allan@epa.gov.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Allan Batka", with a stylized flourish at the end.

Allan Batka, Engineer
Underground Injection Control Branch

cc: MDEQ, Raymond Vugrinovich